



Policy Number: QA7.020	Policy Section: Quality Assurance	Effective: October 1, 2008 Amended: November 24, 2016
Title: External Reviews		Executive Sponsors: Director, Quality Assurance

1. PURPOSE

The purpose of an External Review is to have a neutral third party investigation/review of situations outlined in this policy under **Definitions**. This policy sets out the requirements for External Reviews, to ensure that they are conducted in a consistent and transparent way. External Reviews are a formal safeguard designed to:

- Contribute to an open organizational culture that welcomes learning;
- Enhance learning, accountability, service quality and competencies of service providers;
- Support personal and contract outcomes;
- Contribute to consistent responses to significant critical incidents; and
- Assist in preventing future incidents or situations that could put individuals at risk.

This policy applies to CLBC Integrated Service Managers, quality service analysts, and the Director, Quality Assurance.

2. DEFINITIONS

External Review: A neutral third-party investigation of a situation, incident or service, that results in recommendations and possible action. There are three types of external reviews:

1. **Serious Incident Review:** A detailed examination of a situation or incident, undertaken in response to a serious event affecting the safety or well-being of a vulnerable individual. A serious incident review is initiated by CLBC, on a discretionary basis, either in response to direct information received, or upon the recommendation of an appropriate community partner or statutory agency such as Community Care Facilities Licensing, BC Coroner’s Service, or the Medical Consultant.
2. **Instructional Review:** A review of a practice, situation, or incident, in which no serious harm was done to individuals served, staff or others, but a potential for harm was identified. An instructional review serves as a positive learning opportunity to highlight approaches that are more effective for service providers, CLBC and others. An instructional review may be initiated by CLBC or requested by a service provider.

3. **Quality Service Review:** An in-depth audit of specific or overall services that a service provider is performing. A quality service review is initiated by CLBC on an as-needed basis or as part of on-going evaluation of service provider conformance with CLBC mission, values, and contract expectations, including standards.

External Reviewer: An approved, independent individual, society or company that carries out an external review under contract to CLBC and in accordance with this policy and procedures.

Mortality Review: A specific type of serious incident review conducted by the Medical Consultant and is required in the event of an unexpected death of a person supported by CLBC in community, as described in CLBC's *End of Life Policy*.

3. POLICY

CLBC will conduct periodic external reviews of contracted services and supports as part of its program of quality assurance.

External reviews are initiated at the discretion of CLBC. They may be triggered by circumstances such as:

- One or more critical incidents;
- One or more complaints, including concerns from families and support network members, or internal concerns identified by CLBC staff;
- Request by a service partner professional or agency;
- Investigation by a regulatory agency;
- Request by a service provider;
- Significant changes affecting a service provider such as a change in ownership or accreditation status; and
- Issues raised in a mortality review that indicate the need for a broader review.

Directing External Reviews

The external review process is directed by a quality service analyst in conjunction with the Integrated Service Manager and the Director, Quality Assurance. The Director, Quality Assurance has an important role to play with all external reviews by:

- Approving funds for the review
- Tracking results
- Ensuring that broader organizational learning takes place as a result of the external review.

The external review process includes:

- Determination of the appropriate type of review
- Development of written terms of reference
- Selection of appropriate, approved reviewer(s)
- Contracting with the reviewer
- Liaison with affected parties
- Receipt and review of draft and final reports
- Debriefing with affected parties
- Follow-up on recommended actions.

External reviews require the full participation of everyone involved. This includes in particular the service provider (Board or Owner, management and staff) and the affected individuals and families or others in the person's support network. The types of events or situations that may trigger an external review can be upsetting to the people affected. Individuals and families or people in the person's support network, may have questions and experience a range of emotions including confusion, fear and anger. CLBC is committed to a review process that acknowledges this and supports their involvement.

Actions Resulting from External Reviews

CLBC considers and acts on recommendations from external reviews, including mortality reviews.

Actions resulting from external reviews may include:

- Contract renewal and continuance without change;
- Change or move for an individual to a different service provider;
- Contract modification e.g. changes in expectations of service provider regarding training, supervision, staffing;
- Contract termination;
- Change or modification to CLBC policies or practices; and
- Development of specific protocols.

Approved Suppliers for External Reviews

CLBC maintains a list of approved external reviewers. Reviewers may be approved to undertake one or more types of external reviews, excluding **mortality reviews**, which are conducted only by the Medical Consultant.

Shared Learning from External Reviews

CLBC provides service providers and other stakeholders with opportunities to learn from the outcomes and recommendations of external reviews, as appropriate, in general terms, to maximize the benefit of external reviews.

4. PROCEDURES

Directing External Reviews

4.1 The Director, Quality Assurance oversees all external reviews and provides support and assistance as required to CLBC offices directing external reviews. The level and nature of the Director's involvement varies depending on the scope and issues of the review; it may include any of the procedures generally assigned to quality service analysts or Integrated Service Managers.

4.2 The quality service analyst determines the need to initiate an external review based on available information and consultation as appropriate and request approval for the review from the Integrated Service Manager. The Integrated Service Manager determines the appropriate type of review using the criteria matrix "**Determining the Type of External Review required**" (See **Appendix i**).

4.3 The quality service analyst develops the terms of reference for the review, using the outline in **Section 5, Documentation** (See **Appendix ii**). The Integrated Service Manager reviews and approves the terms of reference.

4.4 The quality service analyst accesses the List of Approved Suppliers for External Reviews. The analyst carries out the selection process and selects an External Reviewer in accordance with the *CLBC Procurement and Contracting Policy*.

4.5 The quality service analyst selects a reviewer as per **4.4** above, based on availability, qualifications and experience, approach, suitability, and price and submits a request for the funding to the Integrated Service Manager.

4.6 The Integrated Service Manager arranges for funding from the Director, Quality Assurance.

4.7 The quality service analyst develops and executes the contract with the external reviewer, with support from Corporate Services, if required.

4.8 The quality service analyst tracks the external review process, and documents all decisions and actions taken.

4.9 The quality service analyst ensures that the health, safety and well-being of affected individuals and families are safeguarded during the review process. This includes ensuring there is no retaliation as a result of them speaking up or participating in the review. Individuals and families are supported and encouraged to work with the reviewer to achieve the best possible outcomes, including participating in interviews, if requested. The quality service analyst keeps affected individuals and a family informed of the progress of the review, and includes them in debriefing and follow-up. They are informed about the confidentiality and consent policies affecting the review, and that any allegation or disclosure of abuse or other serious wrongdoing must be reported by the reviewer to the appropriate authorities.

4.10 The quality service analyst provides information and support to affected service providers during the review process, and ensures that service providers are provided opportunity to share their perspectives.

4.11 The quality service analyst provides information to service providers about the CLBC external review process. This includes the expectation of cooperation with the reviewer by providing access to information, premises and staff; participation in debriefing and follow-up; and carrying out recommendations that result from the review.

4.12 The quality service analyst liaises and coordinates with external agencies such as the Police, Coroner, Ombudsman, Community Care Licensing, WorkSafe BC, and others as appropriate.

4.13 The Integrated Service Manager ensures that the Director, Quality Assurance is kept informed of the progress and outcomes of the review.

4.14 The quality service analyst ensures conformance with CLBC policy related to confidentiality and consent, throughout the review process.

4.15 The quality service analyst ensures the external reviewer completes the review and receives the draft report from the reviewer.

4.16 The quality service analyst distributes the draft report to affected CLBC staff, service providers, individuals and families, asking them to review it and identify any factual errors or omissions.

4.17 The quality service analyst arranges with the reviewer for any factual errors or omissions to be corrected in the draft report, and then receives the final report and forwards a copy to the Integrated Service Manager.

4.18 The quality service analyst distributes the final report and arranges for the external reviewer to debrief with CLBC staff, and affected service providers, individuals, and families as appropriate.

4.19 If required, the Communications Department prepares and distributes any press releases required as a result of an external review process or report, and manages any media relations resulting from an external review and/or the circumstances that trigger it.

Actions Resulting from External Reviews

4.20 The quality service analyst follows up on recommended actions in the final report and monitors implementation by service providers as appropriate. The quality service analyst liaises with facilitators if changes in an individual's supports or service providers are required.

4.21 The Director, Quality Assurance documents materials related to each review and final report; maintains records about external reviews; and reports on outcomes and trends identified in external reviews.

Approved Suppliers for External Reviews

4.22 Corporate Services maintains and updates a List of Approved Suppliers for External Reviews. The list includes information about:

- Professional qualifications and experience
- Skills and area(s) of specialty or expertise
- Multicultural and/or Aboriginal experience
- References
- Price

4.23 Services provided by external reviewers may include:

- Consultation
- Facilitation
- Problem solving and conflict resolution
- Program evaluation/quality assurance
- Program planning and development
- Data-gathering, including interviewing and document/file review
- Assessment
- Analysis
- Reports and recommendations
- Debriefing and follow-up with CLBC staff, service providers and affected individuals/families

Shared Learning from External Reviews

4.24 The Director of Quality Assurance establishes ways to support the sharing of information about external reviews and outcomes among staff, service providers and others. This may include information available on the website and/or an annual publication.

5. DOCUMENTATION

5.1 Analysts will use the “**Outline for Terms of Reference for an External Review**” (See **Appendix ii**) to create the terms of reference for the external review.

6. PRACTICE

CLBC staff is encouraged to incorporate the following best practices when implementing this policy:

Coordination

Work cooperatively with all involved parties contributes to a comprehensive review and meaningful results. This includes working in cooperation with the Medical Consultant and Coroner in regards to Mortality Reviews.

Transparent Process

Communicate openly about the process so as to minimize anxiety for everyone involved and affected.

Organizational Learning

Be open to learning and change as a result of reviews, both as individuals and as organizations.

Flexibility

Recognize different situations require different types of approaches.

Respect

Uphold the dignity and value of everyone involved in the process, particularly persons served and their families and support networks.

7. REFERENCES

Monitoring Guidelines

Critical Incidents;

Investigations of Abuse and Neglect

End-of -Life Policy

Procurement and Contracting Policy

Complaints Resolution Policy

Review the triggering or initiating events or situation. Look at the four categories across the top of the matrix - seriousness, frequency, other agency involvement and rights of persons served. Determine the type of review that fits most closely to the situation you are addressing. If in doubt, consult with the Director, Quality Assurance..

Review Type	Triggering / Initiating Event(s)			
	Seriousness	Frequency	Other Agency Involvement	Rights of Persons Served
Serious Incident Review	Serious critical incident (not involving death) e.g. abuse allegations, criminal charges, or serious health and safety concerns	One or more serious events or a culminating event. Consider trends or patterns of unplanned events that did not result in injury, illness, or damage, but had the potential to do so (near misses)	Involvement of other regulatory bodies such as Licensing, WCB, Mental Health or the Police	Risk of significant infringement of rights, including serious harm
	Unexpected death of person supported by CLBC (Done in conjunction with Mortality Review)	Any unexpected death of person supported by CLBC	Involvement of other regulatory bodies such as Licensing, the Coroner, WCB, Mental Health or the Police	Risk of significant infringement of rights, including serious harm (death)
Quality Service Review	Substantial change in services, ownership or accreditation status Licensing reports Complaints (after CLBC complaint process has been followed) Ongoing health and safety concerns	More than 1-3 events. Consider trends or patterns of unplanned events that did not result in injury, illness, or damage, but had the potential to do so	Possible involvement of other regulatory bodies such as Licensing, WCB, Mental Health or the Police	Risk of some infringement of rights
Instructional Review	Professional support request for practice review e.g. health care, justice, mental health Financial issues	Ongoing concerns over a period of weeks or months	Not usually	No serious harm; possible infringement of rights

Appendix ii Outline for Terms of Reference for an External Review

For use by CLBC quality service analysts when external reviews are initiated.

Type of Review

Indicate the type of review. Use the language from the definitions in the CLBC external review policy, adapting it to describe the situation accurately.

Section 1: Purpose and Background

Describe the triggering or initiating event(s), (while protecting individual personal information). Explain the background, including any involvement of other agencies or previous reviews. Reference any pertinent documents. Describe the purpose and expected outcome of the review.

Section 2: Scope

Define what issues, services and circumstances are in and out of scope. Describe any interface, overlap or boundaries with other investigations.

Section 3: Approach / Methods

Describe the approach and methods to be used; consider the following categories:

Site Visits

- Locations identified

Interviews

- Persons served, families, advocates
- Service provider - staff, Board, Owner, management
- CLBC personnel
- Others as applicable

Document and File Review

- Policies, procedures, guidelines
- Records of person served
- Complaints
- Satisfaction surveys
- Meetings, reports, plans, correspondence
- Personnel files, training records, performance reviews
- Job descriptions
- Other relevant documentation

Identify any methods or approaches that are not to be used.

Section 4: Timeframe

Identify the timeframe required. Be realistic about the time it will take to complete the review. Anticipate that approved external reviewers may not be able to start immediately and/or devote themselves full time to the review.

Section 5: Information and Privacy Requirements

Describe the parameters regarding access to information, personal information and confidentiality. Remember that the final report of the review may be subject to *Freedom Of Information and Protection of Privacy Act* requests for information.

Section 6: Specific Considerations

Identify any considerations that are specific to this review, and may affect the approach to be taken e.g. Aboriginal perspectives, historical circumstances, cultural factors, location or access to facilities or programs, travel requirements.

Section 7: Reporting

Identify reporting expectations. Usually includes a written draft report and must include a written final report. Consider having an interim report if the review timeframe is expected to be protracted. Reports need to follow the prescribed terms of reference and should include any recommendations for change and/or acknowledgments of service excellence. Include requirement for the reviewer to debrief the final report and the recommendations contained with CLBC staff, and affected service providers, individuals, families and the persons support network.